

**ORIGINAL**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
MARIO H. CAPOGROSSO

Plaintiff

PRO SE ANSWER  
CV18-2710 (MKB)(LB)

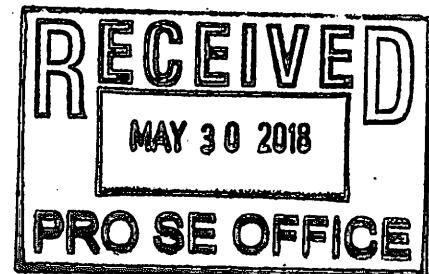
ALAN GELBSTEIN, ET.AL,

Defendants

Defendant SADIQ TAHIR, STATES THE FOLLOWING:

**ADMISSIONS AND DENIALS**

1. The defendant admits paragraph 4 26 89 91.
2. The Defendant denies paragraph 32 90 92 93 94.
3. The defendant lacks sufficient knowledge or information to determine the truth of the allegations in paragraph 1 2 3 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 27 28 29 30 31 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 95 96 97 98 99 100 101.



**DEFENSES**

General Denial.

**COUNTERCLAIMS**

Plaintiff illegally harassed Defendant and continues to illegally harass Defendant by bringing frivolous law suits, Defendant therefore seeks punitive damages against Plaintiff in an amount as the Court may determine appropriate,

As a result of the harassment, defendant was damaged in the sum of \$100,000.

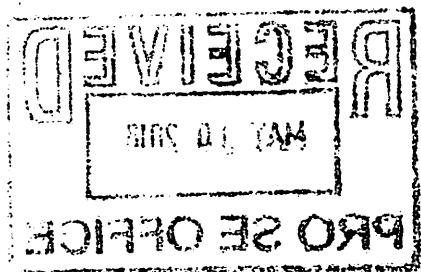
**WHEREFORE** defendant demands judgment against plaintiff in the sum of \$100,000 and punitive damages against Plaintiff in an amount as the Court may determine appropriate,

Signed this 29 day of May 2018.

*[Handwritten signature]*  
Defendant SADIQ TAHIR, PRO SE  
Address 2994 Coney Island Ave Brooklyn NY 11235  
Telephone Number 929 366 1717

SWORN TO BEFORE ME THIS  
29<sup>TH</sup> DAY OF MAY, 2018

1310180



Mario H. Capogrosso

**Defendant Party List Addresses**

- 1) ALAN GELBSTEIN, 2875 West 8<sup>th</sup> Street, Brooklyn New York 11224
- 2) BOSHRA VAHDA TLAMAS, (also known as BUSHRA VAHDAT),  
801 Axinn Avenue, Garden City, New York, 11530
- 3) IDA TRASCHEN, 6 Empire State Plaza, Albany, New York 12228
- 4) ELIZABETH PRICKETT-MORGAN, 120 Broadway, New York City, New York
- 5) JEAN FLANAGAN, 6 Empire State Plaza, Albany, New York 12228
- 6) VINCENT PALMIERI, 6 Empire State Plaza, Albany, New York 12228
- 7) DANIELLE CALVO, 2875 West 8<sup>th</sup> Street, Brooklyn New York 11224
- 8) SADIQ TAHIR, 2875 West 8<sup>th</sup> Street, Brooklyn New York 11224
- 9) PEC GROUP OF NY, INC, 935 S Lake Blvd, #7, Mahopac, NY 10541
- 10) DAVID SMART, 2875 West 8<sup>th</sup> Street, Brooklyn New York 11224

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Plaintiff

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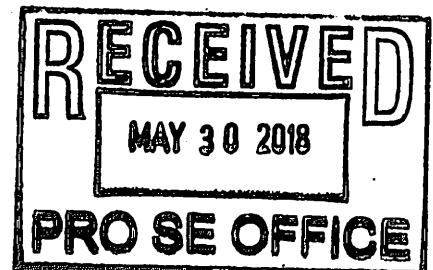
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**DEFENSES**

General Denial.

**COUNTERCLAIMS**

Plaintiff illegally harassed Defendant and continues to illegally harass Defendant by bringing frivolous law suits, Defendant therefore seeks punitive damages against Plaintiff in an amount as the Court may determine appropriate,

As a result of the harassment, defendant was damaged in the sum of \$100,000.

**WHEREFORE** defendant demands judgment against plaintiff in the sum of \$100,000 and punitive damages against Plaintiff in an amount as the Court may determine appropriate,

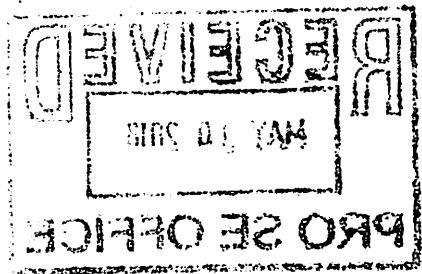
Signed this 29 day of May 2018.

Defendant SADIQ TAHIR, PRO SE

Address 2994 Coney Island Ave Brooklyn NY  
Telephone Number 929 366 1717

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RECEIVED



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